

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**KAITLYN BARLOW,**

**Plaintiffs,**

**v.**

**Civil Action No.: 1:17-cv-100-LF-KK**

**GEICO ADVANTAGE INSURANCE  
COMPANY,**

**Defendant.**

**MOTION TO DISMISS WITH PREJUDICE**

Plaintiff Kaitlyn Barlow, by and through her counsel of record, Martinez, Hart, Thompson & Sanchez, P.C. (David B. Martinez) and Government Employees Insurance Company, by and through its counsel of record, Chapman and Charlebois, P.C. (Donna L. Chapman and Jessica C. Singer) as to the contractual claims only, and Perry Law, PC (Meloney Perry) as to the extra-contractual claims only, hereby move the Court to dismiss with prejudice Plaintiff's Complaint and all causes of action that were or could have been filed therein, on the ground the parties have reached a compromised settlement.

**WHEREFORE**, the parties respectfully request the Court enter an Order

dismissing with prejudice Plaintiff's Complaint and all causes of action that were or could have been alleged therein, with each party to bear their own attorneys' fees and costs.

Respectfully submitted,

**CHAPMAN AND CHARLEBOIS, P.C.**

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And

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*Via Telephonically Approved 3/8/2017*

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*Electronically Approved 2/15/17*

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